

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

METROPLEX ATHEISTS,
Plaintiff,

v.

CITY OF FORT WORTH,
DOWNTOWN FORT WORTH, INC.,
MATTIE PARKER,
CARLOS FLORES,
MICHAEL D. CRAIN,
CHARLES LAUERSDORF,
GYNA BIVENS,
JARED WILLIAMS,
MACY HILL,
CHRIS NETTLES,
ELIZABETH M. BECK,
ALAN BLAYLOCK,
JEANETTE MARTINEZ,
DAVID COOKE,
WILLIAM JOHNSON, *each in their*
individual and official capacities,
Defendants.

No. 4:23-cv-736-O

JURY TRIAL DEMANDED

**PLAINTIFF'S MOTION FOR LEAVE TO
FILE BRIEF IN EXCESS OF PAGE LIMITATIONS
(Relates to Docket No. 25-1)**

Plaintiff, Metroplex Atheists, files this, its *Motion for Leave to File Brief in Excess of Page Limitations* in respect of its *Reply in Support of its Motion for Temporary Restraining Order and Preliminary Injunction*, and in support thereof, would respectfully submit as follows:

INTRODUCTION

1. Metroplex Atheists seeks leave to file a single brief replying to both the City Of Fort Worth's and Downtown Fort Worth, Inc.'s Responses in Opposition to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction (Doc. ## 18-19) (collectively, the "Opposition Briefs") which is 19 pages in length (the "Reply Brief"). Both Defendants have granted their written consent to Metroplex Atheists' proposal. Because there are extraordinary and compelling reasons, Metroplex Atheists submits that permission ought to be granted for it to file the Reply Brief.

ARGUMENT AND AUTHORITIES

2. Rule 7.2(c) of the Local Civil Rules of the United States District Court for the Northern District of Texas, N.D. Tex. L.R., a reply brief must not normally exceed 10 pages. The Court may grant permission to file a brief in excess of the page limit for extraordinary and compelling reasons.

3. Here, the Defendants filed individual briefs in opposition to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction (Doc. ## 18 & 19). In aggregate, the Defendants' briefing totaled 22 pages. These briefs share no arguments in common. Metroplex Atheists seeks permission to file a single Reply Brief which is 19 pages in length.

4. Though the claims against both Defendants contain common legal and factual questions, the Opposition Briefs share no arguments in common. Rather than burden the Court with two separate Reply Briefs—and as the issues addressed in responding to both Opposition Briefs are closely related—Metroplex Atheists

believes it would streamline presentation for the Court if it were to respond in a single brief. As set forth above, counsel for both the City of Fort Worth and Downtown Fort Worth, Inc. have consented in writing to the proposal.

PRAYER

5. Metroplex Atheists prays that this Court grant permission for it to file its Reply Brief.

Dated: August 3, 2023

Respectfully submitted,

GLAST, PHILLIPS & MURRAY, P.C.

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-and-

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** Application for pro hac vice admission pending.*